

~~Superior Law Office~~

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v-

JOSE NAVAS, a/k/a "Panama,"
JOSE ALVAREZ,
FAUSTO VELEZ,
FERNANDO DELGADO,
ARTURO MOREL,
PEDRO VENTURA,
ANTONIO MOREL, and
EURIS VELEZ,

Defendants.

USCSONY
DOCENT
ELECTRONICALLY FILED
DOC #:
INDICTMENT
DATE FILED:
08 NOV 19 2008

08CRIM1144

COUNT ONE

The Grand Jury charges:

1. From at least in or about November 2008, in the Southern District of New York and elsewhere, JOSE NAVAS, a/k/a "Panama," JOSE ALVAREZ, FAUSTO VELEZ, FERNANDO DELGADO, ARTURO MOREL, PEDRO VENTURA, ANTONIO MORELA, and EURIS VELEZ, the defendants, and others known and unknown, unlawfully, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of said conspiracy that JOSE NAVAS, a/k/a "Panama," JOSE ALVAREZ, FAUSTO VELEZ, FERNANDO DELGADO, ARTURO MOREL, PEDRO VENTURA, ANTONIO MORELA, and EURIS VELEZ, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a

controlled substance, to wit, five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(A).

Overt Act

3. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about November 4, 2008, JOSE NAVAS, a/k/a "Panama," and JOSE ALVAREZ, the defendants, transported approximately 230 kilograms of mixtures and substances containing a detectable amount of cocaine into Bronx, New York.

b. On or about November 4, 2008, FAUSTO VELEZ, FERNANDO DELGADO, ARTURO MOREL, PEDRO VENTURA, ANTONIO MOREL, and EURIS VELEZ, the defendants, met with JOSE NAVAS, a/k/a "Panama," and JOSE ALVAREZ, the defendants, in the vicinity of a McDonald's restaurant parking lot in Bronx, New York for the purpose of distributing the cocaine.

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATIONS

4. As a result of committing the controlled substance offense alleged in Count One of this Indictment, JOSE NAVAS, a/k/a "Panama," JOSE ALVAREZ, FAUSTO VELEZ, FERNANDO DELGADO,

ARTURO MOREL, PEDRO VENTURA, ANTONIO MORELA, and EURIS VELEZ, the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the narcotics violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the narcotics violation alleged in Count One of the Indictment.

5. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code,
Sections 841(a)(1), 846, and 853.)

Nancy Kuchom
FOREPERSON

Michael J. Garcia
MICHAEL J. GARCIA
United States Attorney

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INDICTMENT

08 Cr.

(Title 21, United States Code, Section 846.)

Michael J. Garcia
United States Attorney.

Sherry R. Rockman
Deputy U.S. Attorney

11/19/08 Mkt: Post 11/1/87 Indictment filed

Assigned to Judge Parley.

- Sack, M.J.